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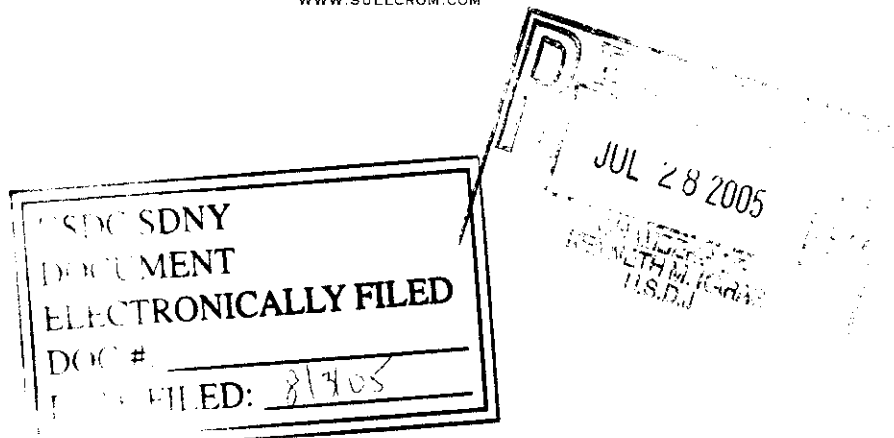
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July 28, 2005

By Hand

MEMO ENDORSED

The Honorable Kenneth M. Karas,
United States District Judge,
United States District Court,
Southern District of New York,
500 Pearl Street, Room 920,
New York, New York 10007.

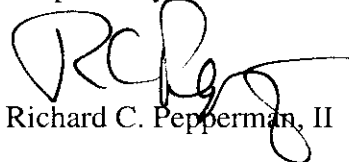
MEMO ENDORSED

Re: Kimball v. MBNA Corp., et al., No. 05cv4725 (KMK) and
McMath v. MBNA Corp., et al., No. 05cv05168 (KMK)

Dear Judge Karas:

As was discussed during the pre-motion conference yesterday, defendants respectfully request that the Court deem the papers previously filed by defendants with the Court on July 11, 2005 as defendants' motion to consolidate the two above-referenced actions and transfer them to the District of Delaware pursuant to 28 U.S.C. § 1404(a).

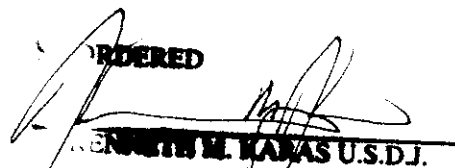
Respectfully,


Richard C. Pepperman, II

cc: Curtis V. Trinko
(Law Offices of Curtis V. Trinko, LLP)

Peter E. Seidman
Andrei Rado
(Milberg Weiss Bershad & Schulman)

Mario Alba, Jr.
(Lerach Coughlin Stoia Geller Rudman & Robbins LLP)


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